

Exhibit 76

Plaintiffs' Corrected Averment of Jurisdictional Facts and
Evidence and/or Statement of Facts as to Defendant Al Rajhi Bank
Pursuant to Rule 56.1

E38

UNCLASSIFIED

ORIGIN EB-00

INFO	LOG-00	NP-00	AID-00	AMAD-00	CIAE-00	COME-00	CTME-00
	INL-00	USNW-00	DODE-00	DOEE-00	DOTE-00	PERC-00	SRFP-00
	DS-00	EUR-00	OIGO-00	E-00	FAAE-00	FBIE-00	VC-00
	FRB-00	H-00	TEDE-00	INR-00	IO-00	ITC-01	LAB-01
	VCE-00	AC-00	NEA-00	DCP-00	NSAE-00	OIG-00	OMB-00
	NIMA-00	OPIC-01	TFBI-00	ACE-00	SCT-00	FMPC-00	SP-00
	SSO-00	SS-00	STR-00	TRSE-00	USIE-00	ECA-00	DSCC-00
	PRM-00	DRL-00	G-00	SAS-00	SWCI-00	/003R	

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SOURCE: KODAKA.018012

DRAFTED BY: EB/ESC/TFS:JELDRIDGE -- 06/18/04 (202) 647-9452

APPROVED BY: EB:EAWAYNE

EB/ESC: GGLASS EB/ESC/TFS: NROTHSTEIN EUR/PGI: LREASOR

EUR/SE: LSILVERMAN EUR/SE: HBONAQUIST NEA/ARP:

TWILLIAMS SCT: TNAVRATIL INR/EC: ACHAMBERS TREASURY:

TSANDERS

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O 182102Z JUN 04

FM SECSTATE WASHDC

TO AMEMBASSY ANKARA IMMEDIATE

RELEASED IN PART
B1, 1.4(B), 1.4(D)

S E C R E T STATE 134966

E.O. 12958: DECL: 06/17/15

TAGS: ECON, EFIN, ETTC, PREL, PTER, TU, SA

SUBJECT: TERRORIST FINANCE: [REDACTED]

B1

REF: (A) STATE 88064

(U) CLASSIFIED BY EB A/S E. ANTHONY WAYNE BASED UPON
REASONS 1.4 (B) AND (D).

1. (U) THIS IS AN ACTION REQUEST. SEE PARA 6.

2. (S) SUMMARY: THE USG BELIEVES THAT SOME ELEMENTS OF THE INTERNATIONAL ISLAMIC RELIEF ORGANIZATION (IIRO) HAVE BEEN EXPLOITED BY TERRORISTS AND THEIR FINANCIERS AS A MEANS OF TRANSFERRING ASSETS, PROVIDING ORGANIZATIONAL COVER, OR OTHERWISE SUPPORTING EXTREMIST, VIOLENT OPERATIONS.

B1

UNITED STATES DEPARTMENT OF STATE
 REVIEW AUTHORITY: SHARON E AHMAD
 CLASSIFICATION: SECRET REASON: 1.4(B), 1.4(D)
 DECLASSIFY AFTER: 18 JUN 2020
 DATE/CASE ID: 19 AUG 2009 200903390

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END SUMMARY.

3. (U) IIRO IS A NON-GOVERNMENTAL ORGANIZATION (NGO), FIRST ESTABLISHED IN 1978 BY THE ISLAMIC WORLD LEAGUE, AND ENDORSED BY THE SAUDI GOVERNMENT IN 1979. THE STATED OVERALL MISSION OF THE IIRO IS DIRECTED TOWARD THE PROVISION OF MEDICAL, EDUCATIONAL, AND SOCIAL SUPPORT FOR THOSE IN NEED. IIRO HAS TRADITIONALLY PROVIDED EDUCATIONAL PROGRAMS TO REFUGEES AND DISPLACED PERSONS AS WELL AS SUPPORTED SOCIAL AND ECONOMIC DEVELOPMENT WORLDWIDE. IT HAS ALSO PROVIDED MORAL SUPPORT AND

ASSISTANCE IN KIND AND IN CASH FOR POOR AND DESTITUTE MUSLIMS. IIRO PROVIDED HEALTH CARE, INCLUDING MEDICINES AND FACILITIES, TO KOSOVO REFUGEES, FOR EXAMPLE, IIRO HAS ESTABLISHED A WIDE NETWORK OF NATIONAL AND INTERNATIONAL CONTACTS WITH VARIOUS ISLAMIC AND NON-ISLAMIC RELIEF ORGANIZATIONS, INSTITUTIONS AND INDIVIDUALS, OPERATING IN SEVERAL COUNTRIES IN EUROPE, ASIA AND AFRICA.

4. (S/NF) WHILE IIRO DISTRIBUTES MILLIONS OF DOLLARS IN AID TO SUPPORT HUMANITARIAN EFFORTS, THERE IS ALSO SOME EVIDENCE THAT PARTS OF THE ORGANIZATION HAVE BEEN EXPLOITED BY AL-QAIDA AND OTHER TERRORIST ORGANIZATIONS. FOR EXAMPLE, IIRO HAS BEEN CITED AS THE PRINCIPAL SPONSOR OF TERRORIST TRAINING CAMPS IN AFGHANISTAN DURING THE TALIBAN REGIME. IIRO HAS ALSO BEEN CITED AS THE CONDUIT FOR FUNDS FROM USAMA BIN LADEN TO TERRORIST ORGANIZATIONS, SPECIFICALLY THAT THE ABU SAYYAF CELL IN MANILA WAS FOUNDED WITH MONEY SENT BY BIN LADEN TO MOHAMED JAMAL KHALIFA THROUGH IIRO.

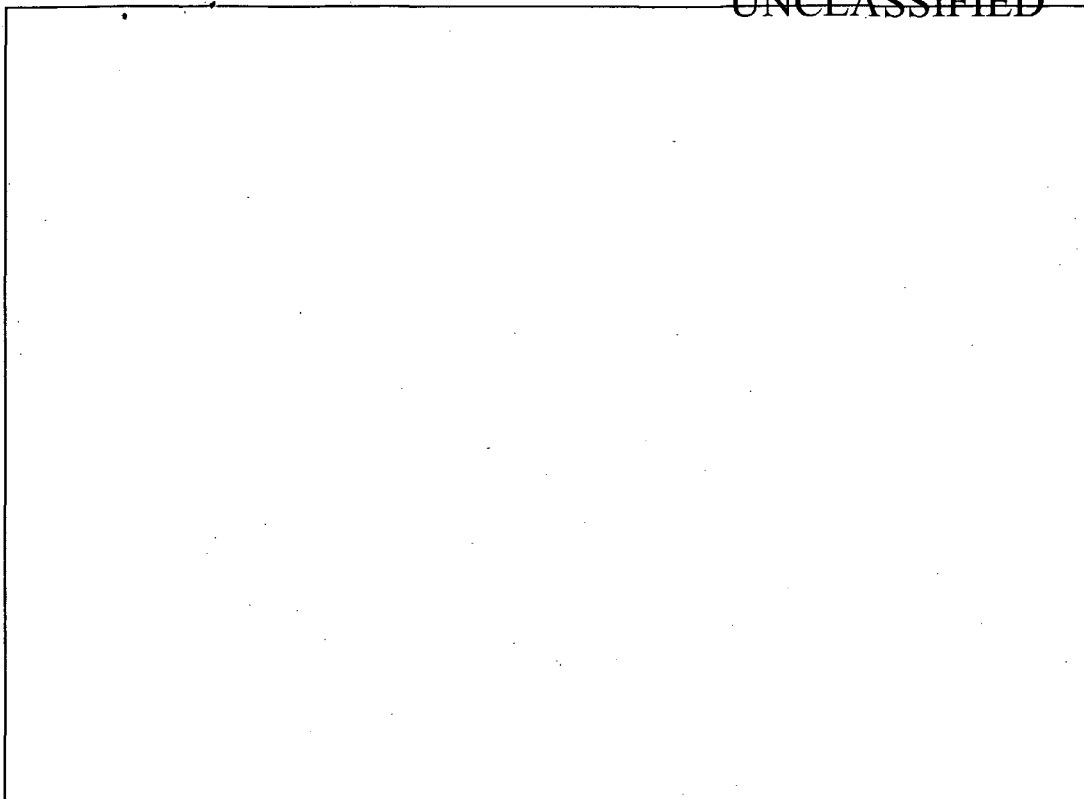
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